

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

MOTION TO MODIFY CONDITIONS OF RELEASE

The defendant, Frank Iacoboni (“Iacoboni”), respectfully requests that the Court modify his conditions of release to allow for out-of-state travel to Florida during the months of January, February, March and April, for the purpose of spending several weeks at a time in Florida followed by approximately one week in Massachusetts each month.

A proposed itinerary is attached at Exhibit A.

Although the Court's final status report ordered trial on or before March 27, 2008, no trial date has been scheduled in this matter. Since the final status report, new counsel was appointed for co-defendant Joseph Yerardi on October 25, 2007, which will likely extend the deadlines set therein.

Iacoboni will abide by all other conditions of his release, including maintaining weekly contact with Pretrial Services and appearing for all required court dates. The Court allowed a similar motion (D# 290) on December 6, 2006.

Counsel for the government, Fred M. Wyshak, Jr., does not take a position on this motion.

WHEREFORE, Iacoboni respectfully requests that the Court allow his motion.

Respectfully submitted,
FRANK IACABONI
By his attorney,

/s/ Thomas J. Butters
Thomas J. Butters
B.B.O. #068260
BUTTERS BRAZILIAN LLP
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Boston, Massachusetts 02116
617-367-2600

Dated: November 9, 2007

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on this date, including:

Vangie Cuascut
Pretrial Services
Federal Courthouse
595 Main Street, Room 40
Worcester, MA 01608

/s/ Thomas J. Butters
Thomas J. Butters

EXHIBIT A

PROPOSED FLORIDA TRAVEL ITINERARY FOR FRANK IACABONI

Florida Address and Phone:

2401 S. Ocean Drive #2703
Hollywood, FL 33019
Phone: 954-922-8249

The following is a proposed travel itinerary for Frank Iacoboni:

January 5, 2008: Depart to Fort Lauderdale, Florida
January 26, 2008: Return to Massachusetts

January 30, 2008: Depart to Fort Lauderdale, Florida
February 23, 2008: Return to Massachusetts

February 27, 2008: Depart to Fort Lauderdale, Florida
March 19, 2008: Return to Massachusetts

March 25, 2008: Depart to Fort Lauderdale, Florida
April 8, 2008: Return to Massachusetts